Hughes Hubbard & Reed

By ECF & Hand Delivery

Honorable Lewis A. Kaplan   April 29, 2022
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *In re Customs and Tax Administration of the Kingdom of Denmark
        (Skatteforvaltningen) Tax Refund Scheme Litigation*, 18-md-2865 (LAK)[1]

Dear Judge Kaplan:

We write on behalf of all parties concerning the logistics of filing summary judgment motions in the above-referenced action. Under paragraph 2.6 of Pretrial Order No. 29 [ECF No. 675], as subsequently modified by the Joint Stipulation and Order Extending Time to File Motions for Summary Judgment as to Bellwether Cases [ECF No. 771], the parties' motions for summary judgment or partial summary judgment in the seven bellwether cases are due to be filed today, April 29.

In light of the Court's April 25, 2022 order [ECF No. 792] directing the parties to confer with the Court on submitting their summary judgment motion papers in electronic form, and due to the logistical challenges of the parties filing their voluminous motion papers and accompanying exhibits via the Court's CM/ECF system, including spreading the filings to the seven bellwether cases, the parties have agreed to serve their motion papers today and subsequently file them after the parties have conferred with the Court. The parties propose that the Court hold the conference the morning of May 5, but have not yet had an opportunity to confirm that date with the Court's deputy clerk.

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1. This letter relates to case nos. 18-cv-04051, 18-cv-09840, 18-cv-09841, 18-cv-10098, 19-cv-01812, 19-cv-01866, and 19-cv-01898.

The parties are available should the Court have any questions.

Respectfully submitted,

/s/ Marc A. Weinstein
Marc A. Weinstein

cc: all counsel of record (via ECF)